

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NORTH DAKOTA**

In re:

**Jointly Administered**

EPIC Companies Midwest, LLC,  
EPIC Companies Midwest 2023, LLC,  
EPIC Employee, LLC,  
EOLA Capital, LLC, and  
EC West Fargo, LLC,

Bankruptcy No. 24-30281  
Bankruptcy No. 24-30282  
Bankruptcy No. 24-30283  
Bankruptcy No. 24-30284  
Bankruptcy No. 24-30285

Debtors.

Chapter 11

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**SECOND APPLICATION OF STINSON LLP FOR ALLOWANCE OF FEES AND  
EXPENSES AS COUNSEL FOR THE OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS FROM SEPTEMBER 1, 2024, THROUGH SEPTEMBER 30, 2024**

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1. Benjamin J. Court and Stinson LLP (collectively, “Stinson”) make this Second Application for allowance of fees for professional services rendered and for reimbursement of expenses incurred as counsel for the Official Committee of Unsecured Creditors (the “Committee”) of EPIC Companies Midwest, LLC, EPIC Companies Midwest 2023, LLC, EPIC Employee, LLC, EOLA Capital, LLC, and EC West Fargo, LLC (collectively, the “Debtors”) pursuant to 11 U.S.C. § 330.

2. In support of this Application, Stinson respectfully states as follows:

**JURISDICTION**

3. This Court has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334 and Fed. R. Bankr. P. 5005. This a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409. The petitions commencing these Chapter 11 cases were filed on July 8, 2024 (the “Petition Date”). The cases are currently pending before this Court.

4. This Application arises under 11 U.S.C. §§ 503(b)(2), 328(a), 330, 331, and 1103. This Application is filed under Fed. R. Bankr. P. 2016 and 2002(a)(6). Notice of this Application is provided pursuant to the Federal Rules of Bankruptcy Procedure and the Notice and Service Requirements adopted pursuant to Local R. 2002-1.

### **BACKGROUND**

5. On July 30, 2024, the Office of the United States Trustee appointed the Committee. [Dkt. No. 58.]

6. On August 7, 2024, the Committee selected Stinson to serve as its bankruptcy counsel, subject to court approval. On August 13, 2024, the Committee filed the Application to Employ Stinson LLP as Counsel to the Official Committee of Unsecured Creditors (the “Application to Employ”). [Dkt. No. 69.] The Court granted the Application to Employ, effective August 7, 2024, on August 30, 2024 via docket text (the “Order Approving Application to Employ”). [Dkt. No. 101.] A copy of the Order Approving Application to Employ is attached as **Exhibit A.**

7. Pursuant to the Order Approving the Application to Employ, the Court also granted Stinson the authority to apply for fees and expenses pursuant to the Order Establishing Procedures for Interim Compensation and Reimbursement for Expenses for Retained Professionals at Dkt. No. 72 (the “Order Establishing Fee Application Procedures”). The Order Establishing Fee Application Procedures is attached as **Exhibit B.**

8. This is Stinson's second application for compensation under 11 U.S.C. § 331. Stinson's filed its first application on September 16, 2024 (the “First Application”). [Dkt. No. 109.] Pursuant to the Order Approving In Part First Application of Stinson LLP for Allowance of Fees and Expenses as Counsel for the for the Official Committee of Unsecured Creditors from August 7,

2024, to August 31, 2024, the Court approved \$42,776.50 in fees and \$1,953.04 in expenses for a total of \$44,729.54 on October 21, 2024. [Dkt. No. 149.]

**RELIEF REQUESTED**

1. **Fees and Expenses.** By this Application, Stinson requests allowance of fees for professional services rendered during Debtors' Chapter 11 cases between September 1, 2024, to September 30, 2024, in the amount of **\$40,957.50<sup>1</sup>**, and reimbursement of expenses in the amount of **\$2,661.88**, for a total of **\$43,619.38**.

2. The professional services rendered by Stinson are detailed on the attached **Exhibit C**. Those services include the tasks specifically described below:

**(Task Code: B100 and 110) Case Administration: \$12,510.50**

Services include communicating with the Chief Restructuring Officer (“CRO”) and Debtors' counsel; reviewing and analyzing Debtors’ motions and filings and coordinating filings with Debtors; communications with Committee members; communications with a journalist about the cases; and coordination and preparation of all-creditors meeting in Fargo, North Dakota.

<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Year</u></b>	<b><u>Hourly Rate</u></b>	<b><u>Fees</u></b>
Benjamin J. Court	1.3	2024	\$565	\$734.50
Christopher J. Harayda	7.6	2024	\$565	\$4,294.00
Terri A. Running	4.8	2024	\$470	\$2,256.00
Samantha J. Hanson-Lenn	8.4	2024	\$395	\$3,318.00
Stephanie Hess	7.2	2024	\$265	\$1,908.00
<b>TOTAL</b>	<b>29.3</b>			<b>\$12,510.50</b>

Blended Hourly Rate:	\$426.98
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<sup>1</sup> A total of \$2,256.00 in fees by timekeeper Terri A. Running, were incurred in August 2024, and inadvertently not included in the First Application. [Dkt. No. 109.] Accordingly, a total of \$2,256.00 of fees are requested from August 2024, a total of \$38,701.50 are requested for September 1 through September 30, 2024, for a grand total of \$40,957.50 of fees requested under this Second Application.

**(Task Code: B120) Asset Analysis and Recovery: \$7,520.50**

Services include evaluating Debtors' produced documents and analysis regarding potential recoveries; research regarding possible recoveries and strategies; analysis regarding potential claims and asset investigations and possible litigation; prepare for and attend conference with Debtors' counsel and CRO concerning document production, possible claims and litigation, and potential plan considerations.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Christopher J. Harayda	2.1	2024	\$565	\$1,186.50
Samantha J. Hanson-Lenn	7.6	2024	\$395	\$3,002.00
Miranda S. Swift	9.8	2024	\$340	\$3,332.00
<b>TOTAL</b>	<b>19.5</b>			<b>\$7,520.50</b>

Blended Hourly Rate:	\$385.67
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**(Task Code B150) Meetings of and Communications with Creditors: 19,159.00**

Extensive communications via email and phone with creditors and creditors' attorneys regarding the case, bankruptcy process, extension of bar date, in-person meeting in Fargo, and proof of claim process; extensive communications with the Committee regarding case updates and other issues; attend an in-person all-creditors meeting in Fargo, North Dakota.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Benjamin J. Court	4.2	2024	\$565	\$2,373.00
Christopher J. Harayda	6.9	2024	\$565	\$3,898.50
Samantha Hanson-Lenn	22.9	2024	\$395	\$9,045.50
Miranda S. Swift	11.3	2024	\$340	\$3,842.00
<b>TOTAL</b>	<b>45.3</b>			<b>\$19,159.00</b>

Blended Hourly Rate:	\$422.94
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**(B160 and 170) Employment Applications and Fee Applications: \$880.50**

Preparing and revising first application for fees.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Benjamin J. Court	0.3	2024	\$565	\$169.50
Samantha J. Hanson-Lenn	1.8	2024	\$395	\$711.00
<b>TOTAL</b>	<b>2.1</b>			<b>\$880.50</b>

Blended Hourly Rate:	\$419.28
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**(Task Code: B190) Other Contested Matters: \$39.50**

Services included communications with clerk's office regarding bar date order.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Samantha J. Hanson-Lenn	0.1	2024	\$395	\$39.50
<b>TOTAL</b>	<b>0.1</b>			<b>\$39.50</b>

Blended Hourly Rate:	\$395.00
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**(Task Code B230) Financing and Collections: \$226.00**

Services included communications with potential unsecured creditors regarding status of loan documents and underlying transactions.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Benjamin J. Court	0.4	2024	\$565	\$226.00
<b>TOTAL</b>	<b>0.4</b>			<b>\$226.00</b>

Blended Hourly Rate:	\$565.00
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**(Task Code B300 and B310) Claims and Claims Administration: \$621.50**

Services included communications with unsecured creditors regarding claims and analysis and evaluation of issues with claims.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Benjamin J. Court	1.1	2024	\$565	\$621.50
<b>TOTAL</b>	<b>1.1</b>			<b>\$621.50</b>

Blended Hourly Rate:	\$565.00
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**TOTAL FEES: \$40,957.50**

3. **Reimbursement of Expenses.** In the course of this representation, Stinson has also incurred expenses detailed in **Exhibit C**, and requests allowance thereof as follows:

<u>Expenses</u>	<u>Amount</u>
Postage	\$288.42
Event Room for In-Person All-Creditor Meeting	\$1,215.75
Committee Member Hotel Room for In-Person Creditor Meeting	\$368.18
Committee Member Airfare to and from In-Person Creditor Meeting	\$789.53
<b>TOTAL</b>	<b>\$2,661.88</b>

**TOTAL EXPENSES: \$2,661.88**

4. All services for which fees are requested by Stinson were performed for and on behalf of the Committee, and not on behalf of the Debtors or other persons.

**LEGAL BASIS**

5. This Court is authorized to award to professional persons employed by section 1103 of the Bankruptcy Code “reasonable compensation for actual, necessary services rendered by the ... attorney[s] and by any paraprofessional person[s] employed by any such person, and ... reimbursement for actual, necessary expenses.” 11 U.S.C. § 330. The Court must consider the nature, extent, and value of such services, taking into account all relevant factors to determine

whether the request for payment in connection with such services is fair and reasonable. *Id.* The services Stinson provided during the Compensation Period were actual, reasonable, and necessary services on behalf of the Committee, and not on the behalf of any other persons, and the fees and expenses requested in this Application are fair and reasonable under the circumstances of this case.

**WHEREFORE**, Stinson respectfully requests that the Court enter an order:

- A. Allowing Stinson's fees incurred between September 1, 2024, and September 30, 2024, in the amount of **\$40,957.50**, and reimbursement of expenses in the amount of **\$2,661.88**, for a total of **\$43,619.38**.
- B. Authorizing and directing the Debtors to pay Stinson such allowed fees and expenses;
- C. Granting administrative expense priority to Stinson's allowed fees and expenses; and
- D. Granting such other and further relief as may be just and proper.

Dated: November 7, 2024

/s/ Benjamin J. Court

Benjamin J. Court (ND #07776)  
Christopher J. Harayda (MN #0390333)  
Samantha J. Hanson-Lenn (MN #0402035)

**STINSON LLP**

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**COUNSEL TO THE OFFICIAL  
COMMITTEE OF UNSECURED  
CREDITORS.**

**AFFIDAVIT**

I, Benjamin J. Court, an attorney at the law firm of Stinson LLP, declare under penalty of perjury that the foregoing Second Application of Stinson LLP for Allowance of Fees and Expenses as counsel for the Official Committee of Unsecured Creditors from September 1, 2024, through September 30, 2024, is true and correct according to the best of my knowledge, information, and belief.

Dated: November 7, 2024

/s/ Benjamin J. Court  
Benjamin J. Court



## **EXHIBIT A**

**Docket Text:**

Order Approving Application to Employ Benjamin J. Court and Stinson LLP as counsel for the Official Committee of Unsecured Creditors Effective August 7, 2024 (Related Doc # [69]). The application to employ is APPROVED subject to the limitations on compensation provided by 11 U.S.C. § 328. This order is not a determination that the services or rates charged are necessary and reasonable. The person or entity employed under this order shall file a fee application in accordance with the Bankruptcy Code and Federal Rules of Bankruptcy Procedures. See Fed. R. Bank. P. 2016, 2017 and 11 U.S.C. §§ 329, 330. Applicant must also comply with Local Rules. Applicant is also granted authority to apply for fees and expenses pursuant to #[72] Order Establishing Procedures for Interim Compensation and Reimbursement for Expenses for Retained Professionals. As required by applicable federal rule or statute, the Movant shall serve this docket text only order on all appropriate parties that will not receive notice of electronic filing. By Judge Shon Hastings. (Text order only). Signed on 08/30/2024 (vck)

## **EXHIBIT B**

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NORTH DAKOTA**

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In re:

**Jointly Administered**

EPIC Companies Midwest, LLC,  
EPIC Companies Midwest 2023, LLC,  
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Bankruptcy No. 24-30281  
Bankruptcy No. 24-30282  
Bankruptcy No. 24-30283  
Bankruptcy No. 24-30284  
Bankruptcy No. 24-30285

Debtors.

Chapter 11

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**ORDER ESTABLISHING PROCEDURES FOR INTERIM COMPENSATION AND  
REIMBURSEMENT OF EXPENSES FOR RETAINED PROFESSIONALS**

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Debtors filed a Motion for an Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals and (II) Granting Related Relief. Doc. 11. Pursuant to the notice of the Motion [Doc. 16], objections to the Motion were due by July 30, 2024.

Debtors served notice of the Motion. The Court received no objections to the Motion. The Court held a hearing on the Motion on August 14, 2024. Based upon the Motion and the Declaration of Patrick Finn [Doc. 6] and for the reasons stated on the record at the August 14, 2024, hearing, the Court finds that the circumstances of these cases warrant granting the relief provided below.

**IT IS ORDERED** that, except as otherwise provided in any order of the Court, professionals employed in this bankruptcy case, including Fredrikson & Byron, P.A., shall be permitted to seek interim payment of compensation and reimbursement of expenses by filing monthly applications for interim compensation and reimbursement of expenses.

**IT IS FURTHER ORDERED** that Debtors are authorized to pay all reasonable amounts invoiced by Lighthouse Management Group, Inc. (“Lighthouse”) for fees and expenses on a bi-weekly basis.

**IT IS FURTHER ORDERED** that Lighthouse will file with the Court and serve on Debtors, the United States Trustee, and any statutory committee appointed in this case (the “Notice Parties”) a monthly staffing report, filed and served by the 20th of each month for the previous month, identifying the Lighthouse employees who worked on this case, the total hours billed by Lighthouse, and a summary of the tasks performed. Lighthouse will also file with the Court and serve on the Notice Parties a quarterly compensation report by the 20th of each month following the end of a quarter, showing the total fees and expenses for the preceding quarter. These reports will be deemed applications for interim compensation under sections 328 and 330. Parties in interest may object to the reports within 21 days after notice. The Court will rule on the applications after the deadline to object passes or after a hearing on the application.

**IT IS FURTHER ORDERED** that Debtors will allocate the fees and expenses approved among Debtors pro rata if the professionals charge for tasks that generally apply to all cases and to the appropriate Debtor if the tasks relate solely to a specific Debtor.

Dated: August 14, 2024.



SHON HASTINGS, JUDGE  
UNITED STATES BANKRUPTCY COURT

## **EXHIBIT C**

**Stinson LLP**

**Invoice Detail**

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**Timekeeper Summary**

<b>Timekeeper</b>	<b>Title</b>	<b>Rate</b>	<b>Hours</b>	<b>Amount</b>
Benjamin Court	Partner	565.00	7.30	4,124.50
C.J. Harayda	Partner	565.00	16.60	9,379.00
C.J. Harayda	Partner		4.00	No Charge
Terri Running	Of Counsel	470.00	4.80	2,256.00
Terri Running	Of Counsel		1.70	No Charge
Miranda Swift	Associate	340.00	21.10	7,174.00
Samantha Hanson-Lenn	Associate	395.00	40.80	16,116.00
Samantha Hanson-Lenn	Associate		8.00	No Charge
Stephanie Hess	Paralegal	265.00	7.20	1,908.00
Stephanie Hess	Paralegal		0.10	No Charge
<b>Current Professional Services</b>			<b>111.60</b>	<b>\$40,957.50</b>

**Professional Services**

<b>Date</b>	<b>Task</b>	<b>Description/Timekeeper</b>	<b>Hours</b>	<b>Amount</b>
<b>B100 - Administration</b>				
08/09/24	B100	Analysis regarding new case, initial issues, and strategy (.8); petition review (.5); analyze issues regarding employment application (.4); review articles (.3). Terri Running	2.00	940.00
08/12/24	B100	Attention to petition and schedules (1.8); correspondence regarding additional investigation results (.4); attention to articles research (.6). Terri Running	2.80	1,316.00
<b>Total B100 - Administration</b>			<b>4.80</b>	<b>2,256.00</b>
<b>B110 - Case Administration</b>				
09/02/24	B110	Communications regarding NDA; review signature pages. C.J. Harayda	0.30	169.50
09/03/24	B110	Coordinate execution of CA with debtors (.2); communication regarding same with committee	0.90	508.50

**Stinson LLP**

**Invoice Detail**

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<b>Date</b>	<b>Task</b>	<b>Description/Timekeeper</b>	<b>Hours</b>	<b>Amount</b>
		members (.1); review questions from creditors as to claims and schedules (.4); communication with S. Hanson-Lenn regarding same coordinate creditor meeting in Fargo (.2). C.J. Harayda		
09/03/24	B110	Prepare for meeting of unsecured creditors in Fargo, North Dakota. Stephanie Hess	0.90	238.50
09/04/24	B110	Review questions from creditors and UCC members regarding claims and process (.3); coordinate creditor meeting and logistics (.1); analyze issues regarding strategy on collections (.3). C.J. Harayda	0.70	395.50
09/04/24	B110	Coordinate accommodations for meeting of unsecured creditors in Fargo, North Dakota with Radisson Blue hotel sales manager. Stephanie Hess	0.50	132.50
09/05/24	B110	Review and analyze questions from creditors on claims and related issues (.2); communication with K. Nixon regarding CA and access to documents (.1); follow-up on location for creditor meeting (.1). C.J. Harayda	0.40	226.00
09/06/24	B110	Exchange emails with journalist regarding case issues (.2); phone conferences with debtor's counsel and CRO regarding same and regarding press strategy (.4); telephone conference with CRO regarding claim inquiries (.2). Benjamin Court	0.80	452.00
09/06/24	B110	Review proposals for creditor meeting location (.2); review responses to creditor questions (.4); review invitation to creditor meeting (.1). C.J. Harayda	0.70	395.50
09/06/24	B110	Research meeting room accommodations for meeting of unsecured creditors in Fargo, North Dakota. Stephanie Hess	1.20	318.00
09/09/24	B110	Review and revise meeting invitation for unsecured creditors (.1); communications regarding documents from lender (.2); review creditor questions regarding claims and process (.5).	0.80	452.00



**Stinson LLP**

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<b>Date</b>	<b>Task</b>	<b>Description/Timekeeper</b>	<b>Hours</b>	<b>Amount</b>
		C.J. Harayda		
09/09/24	B110	Coordinate meeting room accommodations for meeting of unsecured creditors in Fargo, North Dakota with Delta hotel sales manager. Stephanie Hess	0.90	238.50
09/10/24	B110	Finalize hotel and conference room accommodations with Delta Hotel in Fargo for meeting with unsecured creditors. Stephanie Hess	0.80	212.00
09/11/24	B110	Email correspondence with Delta Hotel catering and technology team regarding needs for unsecured creditors meeting. Stephanie Hess	0.40	106.00
09/12/24	B110	Communications with debtors regarding pending motions and fee apps (.2); coordinate creditor meeting in Fargo (.2); review and revise responses to creditor questions (.4). C.J. Harayda	0.80	452.00
09/13/24	B110	Address various creditor claims sent to Stinson rather than being filed with the court (.2); phone conference with journalist regarding background information on EPIC Companies (.3). Benjamin Court	0.50	282.50
09/13/24	B110	Review and analyze documents uploaded by debtors counsel and CRO (.7); review invite and meeting logistics (.2); review response to creditor questions on meeting and revise (.2); review and revise motion to limit notice to creditors on settlement; communication with K. Nixon regarding same (.2). C.J. Harayda	1.30	734.50
09/13/24	B110	Finish preparing fee application (1.9); review and analysis regarding invoice (2.4). Samantha Hanson-Lenn	4.30	1,698.50
09/14/24	B110	Review and provide comments on joint motions for notice guidance and first fee app (.9) communications with debtor counsel on same (.3); communications regarding organization of creditor meeting in Fargo (.2) C.J. Harayda	1.40	791.00

**Stinson LLP**

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<b>Date</b>	<b>Task</b>	<b>Description/Timekeeper</b>	<b>Hours</b>	<b>Amount</b>
09/17/24	B110	Review and advise on responses to creditor inquiries. C.J. Harayda	0.10	56.50
09/18/24	B110	Prepare meeting agenda for meeting with all creditors in Fargo. Samantha Hanson-Lenn	2.50	987.50
09/18/24	B110	Email correspondence with Delta Hotel regarding meeting preparations. Stephanie Hess	0.40	106.00
09/19/24	B110	Review questions on creditor issues and requests (.1); review and revise response to creditors (.1). C.J. Harayda	0.20	113.00
09/19/24	B110	Email correspondence with Delta Hotel regarding updated numbers for meeting attendees, audio capabilities, and catering. Stephanie Hess	0.40	106.00
09/20/24	B110	Coordinate all creditors meeting and finish preparing for meeting. Samantha Hanson-Lenn	1.50	592.50
09/20/24	B110	Compile return mail and email correspondence with opposing counsel regarding the same. Samantha Hanson-Lenn	0.10	39.50
09/20/24	B110	Finalize meeting room and arrangements with Delta Hotel in advance of unsecured creditors meeting. Stephanie Hess	0.50	132.50
09/23/24	B110	Drive to Fargo from Minneapolis for creditor meeting. Samantha Hanson-Lenn	4.00	No Charge
09/23/24	B110	Assist case team in preparation for and attendance at unsecured creditors meeting in Fargo. Stephanie Hess	1.20	318.00
09/24/24	B110	Drive back to Minneapolis from Fargo for creditors meeting. Samantha Hanson-Lenn	4.00	No Charge
09/25/24	B110	Receipt and review of invoice from Delta Hotel for services rendered for the meeting with unsecured creditors. Stephanie Hess	0.10	No Charge

**Stinson LLP**

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<b>Date</b>	<b>Task</b>	<b>Description/Timekeeper</b>	<b>Hours</b>	<b>Amount</b>
<b>Total B110 - Case Administration</b>			<b>32.60</b>	<b>10,254.50</b>
<b>B120 - Asset Analysis and Recovery</b>				
09/07/24	B120	Communications regarding creditor meeting (.1); review update from debtor counsel on document sharing (.1). C.J. Harayda	0.20	113.00
09/09/24	B120	Review and analysis of promissory notes and other documents provided by Debtors. Miranda Swift	4.10	1,394.00
09/09/24	B120	Review produced documents from Debtor and analysis regarding the same and creditor notes. Samantha Hanson-Lenn	2.20	869.00
09/10/24	B120	Prepare for and conference with debtor counsel and CRO regarding documents, possible claims, asset buckets, and possible litigation and plan considerations (1.1); review issues regarding claim deadline extension (.5); review and revise responses to claims questions (.2); analyze issues regarding claims extension order and timing (.1). C.J. Harayda	1.90	1,073.50
09/10/24	B120	Extensive review of promissory notes (2.3) prepare reference summary of same (1.3). Miranda Swift	3.60	1,224.00
09/10/24	B120	Continue review notes and documents produced by debtor; (.5) analysis and memorandum regarding the same (.5). Samantha Hanson-Lenn	1.00	395.00
09/11/24	B120	Continued review, analysis, and summary of promissory notes. Miranda Swift	2.10	714.00
09/18/24	B120	Evaluate possible avenues of recovery per information received from creditor. Samantha Hanson-Lenn	0.60	237.00
09/20/24	B120	Continue to review creditor notes and analysis regarding the same. Samantha Hanson-Lenn	1.10	434.50

**Stinson LLP**

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<b>Date</b>	<b>Task</b>	<b>Description/Timekeeper</b>	<b>Hours</b>	<b>Amount</b>
09/26/24	B120	Finish reviewing and analyzing produced documents from Debtor and memorandum to file regarding the same. Samantha Hanson-Lenn	2.70	1,066.50
<b>Total B120 - Asset Analysis and Recovery</b>			<b>19.50</b>	<b>7,520.50</b>
<b>B150 - Meetings of and Comm. with Creditors</b>				
09/03/24	B150	Review of voice mail from creditor and related email communications. Miranda Swift	0.10	34.00
09/03/24	B150	Review correspondence from creditor; prepare correspondence responding to the same. Samantha Hanson-Lenn	0.60	237.00
09/04/24	B150	Telephone conference with creditor regarding case notices and research regarding the same. Miranda Swift	0.40	136.00
09/05/24	B150	Telephone conferences and emails with creditors regarding filing of proofs of claim. Miranda Swift	0.50	170.00
09/05/24	B150	Review various correspondence from two creditors regarding case and claims (.4); prepare correspondence responding to questions regarding the same (.8); telephone conference with creditor regarding case and claims (.4). Samantha Hanson-Lenn	1.60	632.00
09/06/24	B150	Evaluate correspondence regarding meeting with creditors in Fargo (.2); begin prepare RSVP for meeting (.1). Samantha Hanson-Lenn	0.30	118.50
09/09/24	B150	Prepare letter to all creditors regarding meeting in Fargo. Samantha Hanson-Lenn	1.00	395.00
09/10/24	B150	Exchange emails with various unsecured creditors addressing questions about proofs of claim and the proof of claim filing deadline (.2); address order extending bar date for filing proofs of claim (.2).	0.40	226.00

**Stinson LLP**

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<b>Date</b>	<b>Task</b>	<b>Description/Timekeeper</b>	<b>Hours</b>	<b>Amount</b>
		Benjamin Court		
09/10/24	B150	Telephone conference with creditor regarding proofs of claim and follow up email. Miranda Swift	0.70	238.00
09/10/24	B150	Finalize letter and recipient list in preparation for mailing (.7); review correspondence from creditor and prepare response regarding the same (.5). Samantha Hanson-Lenn	1.20	474.00
09/11/24	B150	Address creditor meeting logistics an topics to cover (.1); exchange emails with journalist regarding EPIC Companies issues (.2). Benjamin Court	0.30	169.50
09/11/24	B150	Correspondence with various creditors and analysis regarding the same. Samantha Hanson-Lenn	1.20	474.00
09/12/24	B150	Exchange emails with counsel for various creditors regarding extension of bar date to file proofs of claim (.3); multiple email regarding preparation and filing of fee applications (.1). Benjamin Court	0.40	226.00
09/12/24	B150	Prepare email to creditors regarding meeting in Fargo (.3) review and prepare various correspondence to and from creditors regarding the same (1.1); correspondence with creditor regarding claims (.3). Samantha Hanson-Lenn	1.70	671.50
09/13/24	B150	Respond to inquiries regarding creditor meeting. Miranda Swift	0.60	204.00
09/13/24	B150	Finalize email correspondence regarding RSVP and review various responses from creditors. Samantha Hanson-Lenn	0.90	355.50
09/16/24	B150	Telephone conference with creditor about address, claims, and meeting. Samantha Hanson-Lenn	0.20	79.00
09/16/24	B150	Various correspondence with creditors about meeting in Fargo. Samantha Hanson-Lenn	0.50	197.50
09/16/24	B150	Telephone conference with creditor regarding proofs of claim and questions about the same.	0.20	79.00

**Stinson LLP**

**Invoice Detail**

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<b>Date</b>	<b>Task</b>	<b>Description/Timekeeper</b>	<b>Hours</b>	<b>Amount</b>
		Samantha Hanson-Lenn		
09/17/24	B150	Discussion regarding responses to creditor questions. Miranda Swift	0.40	136.00
09/17/24	B150	Various correspondence with creditors regarding meeting in Fargo and proofs of claim questions. Samantha Hanson-Lenn	1.10	434.50
09/17/24	B150	Review correspondence with creditor regarding mailing (.3); telephone conference with creditor regarding the same; various correspondence with opposing counsel regarding the same (.4). Samantha Hanson-Lenn	0.70	276.50
09/18/24	B150	Review of proposed agenda for meeting with creditors. Miranda Swift	0.30	102.00
09/18/24	B150	Telephone conference with creditor's attorney regarding claim, bankruptcy case, and recovery. Samantha Hanson-Lenn	0.90	355.50
09/18/24	B150	Telephone conference with unsecured creditor's attorney. Samantha Hanson-Lenn	0.20	79.00
09/18/24	B150	Review various correspondence from creditors and prepare responses to the same regarding meeting in Fargo. Samantha Hanson-Lenn	0.30	118.50
09/19/24	B150	Preparation for meeting with creditors and review of schedules. Miranda Swift	1.10	374.00
09/19/24	B150	Review various correspondence from creditors and prepare responses to the same. Samantha Hanson-Lenn	0.70	276.50
09/20/24	B150	Review and preparation of mailing list for creditors and communications regarding same. Miranda Swift	2.60	884.00
09/20/24	B150	Telephone conference with various creditors regarding claims and meeting. Samantha Hanson-Lenn	0.20	79.00
09/22/24	B150	Preparation for meeting with creditors. Miranda Swift	0.20	68.00

**Stinson LLP**

**Invoice Detail**

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Invoice No: 43596069

<b>Date</b>	<b>Task</b>	<b>Description/Timekeeper</b>	<b>Hours</b>	<b>Amount</b>
09/23/24	B150	Prepare for and attend creditor meeting in Fargo; follow up conferences with multiple unsecured creditors to address claims, recovery issues, and next steps. Benjamin Court	2.70	1,525.50
09/23/24	B150	Travel to meeting with creditors. C.J. Harayda	4.00	2,260.00
09/23/24	B150	Review and respond to questions from various creditors on claims and notes; prepare for and attend creditors meeting; meeting with UCC members regarding various issues. C.J. Harayda	2.60	1,469.00
09/23/24	B150	Prepare for and attend meeting with unsecured creditors committee. Terri Running	1.70	No Charge
09/23/24	B150	Telephone conferences and communications with creditors in preparation for unsecured creditors meeting (.9); attend unsecured creditors meeting virtually (1.8 NO CHARGE); draft communications in response to creditor email questions (.7). Miranda Swift	1.60	544.00
09/23/24	B150	Participate in creditors meeting and meet with various creditors following meeting bankruptcy process. Samantha Hanson-Lenn	2.20	869.00
09/23/24	B150	Telephone conferences and various correspondence with creditors regarding meeting in Fargo. Samantha Hanson-Lenn	0.50	197.50
09/24/24	B150	Review and advise on creditor inquiries; discuss issues regarding collection and enforcement options C.J. Harayda	0.30	169.50
09/24/24	B150	Travel from meeting with creditors. C.J. Harayda	4.00	No Charge
09/24/24	B150	Draft communications with creditors regarding proofs of claim. Miranda Swift	0.60	204.00
09/24/24	B150	Review and respond to various creditor correspondence regarding claims. Samantha Hanson-Lenn	1.80	711.00
09/25/24	B150	Draft correspondence answering creditor questions.	0.50	170.00

**Stinson LLP**

**Invoice Detail**

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Invoice No: 43596069

<b>Date</b>	<b>Task</b>	<b>Description/Timekeeper</b>	<b>Hours</b>	<b>Amount</b>
		Miranda Swift		
09/25/24	B150	Review and analyze various correspondence from creditors regarding claims and bankruptcy case (.5). telephone conference with creditor regarding follow up from meeting and follow up questions regarding bankruptcy process (1.1). Samantha Hanson-Lenn	1.60	632.00
09/26/24	B150	Draft correspondence answering creditor questions. Miranda Swift	0.60	204.00
09/26/24	B150	Review and prepare correspondence to various creditors regarding questions on claims and bankruptcy cases. Samantha Hanson-Lenn	0.60	237.00
09/30/24	B150	Exchange emails with creditors and counsel regarding analysis of claims and potential claims, authority to resolve claims, and requests for additional information. Benjamin Court	0.40	226.00
09/30/24	B150	Draft responses to creditor questions. Miranda Swift	1.10	374.00
09/30/24	B150	Review and analyze correspondence from creditor (.4); analyze Claims filed and creditor's corresponding notes (.5); phone conference with creditor (.4); prepare correspondence to creditor regarding claims and bankruptcy process (1.4). Samantha Hanson-Lenn	2.70	1,066.50
<b>Total B150 - Meetings of and Comm. with Creditors</b>			<b>51.00</b>	<b>19,159.00</b>
 <b>B160 - Fee/Employment Applications</b>				
09/12/24	B160	Begin prepare fee application. Samantha Hanson-Lenn	1.30	513.50
09/14/24	B160	Draft and revise Fee Application. Samantha Hanson-Lenn	0.50	197.50
<b>Total B160 - Fee/Employment Applications</b>			<b>1.80</b>	<b>711.00</b>



**Stinson LLP**

**Invoice Detail**

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Invoice No: 43596069

<b>Date</b>	<b>Task</b>	<b>Description/Timekeeper</b>	<b>Hours</b>	<b>Amount</b>
<b>B170 - Fee/Employment Objections</b>				
09/16/24	B170	Prepare revisions to fee application pleadings. Benjamin Court	0.30	169.50
<b>Total B170 - Fee/Employment Objections</b>			<b>0.30</b>	<b>169.50</b>
<b>B190 - Other Contested Matters</b>				
09/11/24	B190	Telephone conference with bankruptcy court regarding bar date order. Samantha Hanson-Lenn	0.10	39.50
<b>Total B190 - Other Contested Matters</b>			<b>0.10</b>	<b>39.50</b>
<b>B230 - Financing/Cash Collections</b>				
09/20/24	B230	Telephone conference and email exchanges with potential unsecured creditor regarding status of loan documents and communications regarding underlying transaction issues. Benjamin Court	0.40	226.00
<b>Total B230 - Financing/Cash Collections</b>			<b>0.40</b>	<b>226.00</b>
<b>B300 - Claims and Plan</b>				
09/19/24	B300	Analyze and respond to emails from various unsecured creditors regarding claim and case issues. Benjamin Court	0.30	169.50
<b>Total B300 - Claims and Plan</b>			<b>0.30</b>	<b>169.50</b>
<b>B310 - Claims Administration and Objections</b>				
09/18/24	B310	Telephone conferences with counsel for various unsecured creditors regarding claim issues, background	0.80	452.00

**Stinson LLP**

**Invoice Detail**

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Invoice No: 43596069

Date	Task	Description/Timekeeper	Hours	Amount
		information regarding solicitations and transactions, and possible avenues for recovery. Benjamin Court		
<b>Total B310 - Claims Administration and Objections</b>			<b>0.80</b>	<b>452.00</b>
<b>Current Professional Services</b>			<b>111.60</b>	<b>\$40,957.50</b>

**Disbursements**

Date	Description	Amount
	Postage	288.42
08/27/24	Airfare to Beth Postemski for Reimbursement to attend in-person meeting on Invoice 08272024	789.53
09/24/24	Miscellaneous to BMO Harris Bank NA for Meeting room for unsecured creditors meeting on Invoice 1024 0440 Kugler	1,215.75
09/30/24	Hotel to Beth Postemski for Reimbursement to attend in-person meeting in Fargo, ND on Invoice 09302024	368.18
<b>Total Disbursements</b>		<b>\$2,661.88</b>

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NORTH DAKOTA**

In re:

**Jointly Administered**

EPIC Companies Midwest, LLC,  
EPIC Companies Midwest 2023, LLC,  
EPIC Employee, LLC,  
EOLA Capital, LLC, and  
EC West Fargo, LLC,

Bankruptcy No. 24-30281  
Bankruptcy No. 24-30282  
Bankruptcy No. 24-30283  
Bankruptcy No. 24-30284  
Bankruptcy No. 24-30285

Debtors.

Chapter 11

**NOTICE OF SECOND APPLICATION OF STINSON LLP FOR  
ALLOWANCE OF FEES AND EXPENSES AS COUNSEL  
FOR THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
FROM SEPTEMBER 1, 2024 THROUGH SEPTEMBER 30, 2024**

TO: The parties-in-interest as specified in the Notice and Service Requirements adopted pursuant to Local Rule 2002-1 and the Court's Order limiting notice pursuant to Fed. R. Bankr. P. 2002(i). [Dkt. No. 124.]

1. **NOTICE IS HEREBY GIVEN** that Stinson LLP, as counsel for the Official Committee of Unsecured Creditors, has filed its second application for allowance of fees and expenses, a copy of which is attached hereto and served upon you.

2. **NOTICE IS FURTHER GIVEN** that any objection to the application must be filed with the Clerk of the United States Bankruptcy Court, whose address is Quentin N. Burdick Courthouse, 655 First Avenue North, Suite 210, Fargo, North Dakota 58102, and served upon the attorney whose name and address is listed below, by **November 29, 2024, which is twenty-one (21) days from the date of the filing of this Notice**. Any objections not filed and served may be deemed waived.

Dated: November 7, 2024

/s/ Benjamin J. Court

Benjamin J. Court (ND #07776)

Christopher J. Harayda (MN #0390333)

Samantha J. Hanson-Lenn (MN #0402035)

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**COUNSEL TO THE OFFICIAL  
COMMITTEE OF UNSECURED  
CREDITORS.**